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MCDERMOTT, WILL & EMERY

January 22, 2002

BY FEDERAL EXPRESS

Mr. Thomas Krauss
Illinois Environmental Protection Agency
1021 North Grand Avenue East
Springfield, Illinois 62794

Re: Rexnord Corporation
Response to IEPA Request for Information
Downers Grove, Illinois Groundwater Investigation

Dear Mr. Krauss:

On behalf of Rexnord Corporation ("Rexnord"), I am responding to your recent telephone call to me, in which you, on behalf of the Illinois Environmental Protection Agency ("IEPA"), requested additional information in connection with the Downers Grove, Illinois Groundwater Investigation ("Site"). As discussed below, the enclosed information further demonstrates that Rexnord has no responsibility for the chlorinated solvent contamination at the Site.

You requested additional information from Rexnord regarding the types, quantities and suppliers of solvents used at the Rexnord facility located at 2400 Curtiss Street, Downers Grove, Illinois ("Facility") from 1975 to the present. You also requested copies of Facility invoices related to solvent purchases. Enclosed for your review, we have provided copies of Facility invoices for solvent purchases between 1990 and the date of IEPA's request. Rexnord does not have Facility invoices for solvent purchases from any time before 1990.

The Facility typically retains purchase invoices for a period of 7 years, although, in this case, the Facility had several additional years of invoice records available because of a pending tax audit. I have also enclosed copies of Material Safety Data Sheets ("MSDS") for the solvents known to be used by the Facility since 1975. As you can see from the MSDS, these cleanup solvents are not chlorinated products.

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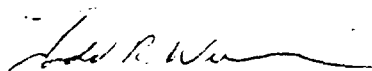
The enclosed documents reaffirm that the only chlorinated solvent use by the Facility consists of solvent used, in minimal quantities, in a small, totally enclosed vapor degreaser, which was purchased by the Facility in 1989. Between 1989 and 1993, the Facility purchased minimal quantities of 1,1,1-trichloroethane for the degreaser, and between 1993 and the present, the Facility has purchased small quantities of trichloroethylene for the degreaser. Copies of invoices for Facility purchases of 1,1,1-trichloroethane and trichloroethylene from 1992 and 1993 are enclosed. Copies of invoices from 1994 to 2001 were previously provided to IEPA. Spent chlorinated solvent sent offsite for recycling has approximated two drums per year. The Facility has never had a spill or release of chlorinated solvents.

The enclosed documents also provide information on the types and quantities of non-chlorinated solvents purchased and used by the Facility since 1975. These non-chlorinated solvents include Perchem 1195, Perchem 1140 DO, Solvent 529-66 and Condursal Thinner. The Facility uses these non-chlorinated solvents primarily as cleanup solvent for cleaning parts, as a solvent in its brush plating operation and in its selective carburizing process.

The enclosed invoices indicate that between 1990 and the present, the Facility has had annual purchases of 1,550 gallons to 4,900 gallons of mineral-spirit type solvents. Since 1997, the Facility has purchased mineral-spirit type solvents from Perkins. Prior to 1997, the Facility purchased mineral-spirit type solvents from Ashland Chemical. While purchase invoices are unavailable for the period before 1990, Ashland Chemical is believed to have supplied comparable quantities of mineral-spirit type solvent to the Facility for this time period. The purchase invoices also indicate that the Facility purchased minimal quantities of Condursal Thinner from the Duffy Company since 1990. This is not a chlorinated product. The purchase invoices indicate annual purchases of 6 to 48 quarts of Condursal Thinner. For the time period prior to 1990, Duffy Company is believed to have supplied similarly small quantities of Condursal Thinner to the Facility.

As explained above, Rexnord's use of chlorinated solvents in a small, totally enclosed vapor degreaser beginning in 1989, and the absence of any spills or releases of chlorinated solvents at the Facility, demonstrate that Rexnord cannot be responsible for the contamination at the Site. We reiterate our request that Rexnord be removed from any list of responsible parties for this Site, and that Rexnord not be included on any such lists in the future.

Sincerely,



Todd R. Wiener

TRW/mb
Enclosures

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bcc: Irwin M. Shur, Esq. *(via fax w/o encl.)*
Aaron Hardt, Esq. *(via fax w/o encl.)*
Rudolph A. Fuys, Jr. *(via fax w/o encl.)*

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bcc: Robert E. Bouma, Esq. (*w/o encl.*)
Mark A. Bilut, Esq. (*w/ encl.*)